REMARKS

Claims 14-21 are pending in this application. Claims 14-16 and 20-21 are independent. In light of the amendments and remarks made herein, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections.

By this Amendment, Applicants are amending claims 14 and 16 to more appropriately recite the present invention. It is respectfully submitted that these amendments are being made without conceding the propriety of the Examiner's rejection, but merely to timely advance prosecution of the present application.

Examiner Interview

Applicants wish to thank the Examiner for the interview conducted on April 19, 2004. During the interview, the parties agreed that if claims 14, 16, and 20 were amended to include "selecting from a directly accessible storage," then the claims would overcome the art as cited. By this Amendment, Applicants are amending these claims as agreed upon during the interview. Based upon this amendment, Applicants respectfully request that the outstanding rejections regarding claims 14, 16, and 20, together with claims dependent thereon, be withdrawn.

In the outstanding Official Action, the Examiner rejected claims 15 and 21 under 35 U.S.C. § 102(e) as being anticipated by *Naimpally* (USP 5,589,993); rejected claims 15 and 21 under 35 U.S.C. § 102(e) as being anticipated by *Yoo et al.* (USP 5,897,219);

and rejected claim 21 under 35 U.S.C. § 102(e) as being anticipated by *Kwon* (USP 5,418,658). Applicants respectfully traverse these rejections.

Claim Rejections - 35 U.S.C. § 102 - *Naimpally*

With regard to the Examiner's rejection of claim 15, the Examiner responds to Applicants' arguments by asserting that *Naimpally* teaches the stored data on the medium is composed of the re-encoded data replacing the frames of received coded data at an interval of the received coded data, citing to Fig. 6. However, the Applicants respectfully note that the arguments included in the previous Reply assert that *Naimpally* fails to teach or suggest wherein the coded video data stored is composed by replacing frames of the received coded video data with the corresponding frames of the re-encoded video data generated by the generating portion **at an arbitrary interval**. Applicants respectfully request that the Examiner respond to Applicants' arguments included herein and further set forth in the Applicants' previous Reply that *Naimpally* fails to teach or suggest replacing frames at an arbitrary interval.

With regard to the Examiner's rejection of claim 21, the Examiner has failed to provide any support in the *Naimpally* reference that teaches or suggests the elements as recited in claim 21. As such, Applicants respectfully request that the Examiner provide an argument, sufficient to establish *prima facie*

anticipation under 35 U.S.C. § 102(e), in support of his rejection of claim 21.

Claim Rejections - 35 U.S.C. § 102 - *Yoo et al.*

In response to the Applicants' arguments regarding claim 15, the Examiner states "Yoo teaches that the re-encoded data is stored on the storage portion at an arbitrary interval Fig. 5 and the re-encoded are replaced frames of the received coded data." It is respectfully submitted that this statement does not respond to Applicants' arguments included in the previous Reply.

Applicants argued that *Yoo et al.* discloses a multiplexer for selectively applying output data from the buffer 211 and the output data from the encoder 213 to the error correction coder 22 in response to the selection signal from the controller 214. For example, PICTURE 2, 3, 4 of PROGRAM 2 in Fig. 5 correspond to PICTURE 1, 2, 3 of PROGRAM 2 in Fig. 3 and are shifted by one picture to the right in Fig. 5 as the result of the insertion of PICTURE 1 of PROGRAM 2; PICTURE 6, 7 in Fig. 5 correspond to PICTURE 4, 5 of PROGRAM 2 in Fig. 3 and are shifted by two pictures to the right as the result of the insertion of PICTURE 5 in Fig. 5. Consequently, the data of Fig. 5 contains an increased data in comparison with the data of Fig. 3.

In contrast, the present invention provided in claim 15 recites, *inter alia*, a method for storing coded video data wherein the coded video data stored is composed by replacing frames of the

received coded video data with the corresponding frames of the re-encoded video data generated by the video generating portion at an arbitrary interval. Applicants maintain their position that *Yoo et al.* fails to teach or suggest replacing frames generated by the video generating portion at an arbitrary interval. Applicants respectfully request that the Examiner properly respond to the Applicants' assertions.

Again, while the Examiner indicates that claim 21 is rejected under 35 U.S.C. § 102(e) as being anticipated by *Yoo et al.*, there is no argument set forth in the Official Action advising the Applicants what portion of the *Yoo et al.* reference the Examiner is relying upon to teach or suggest this claimed invention. As such, Applicants respectfully request that the Examiner provide proper arguments sufficient to establish *prima facie* anticipation under 35 U.S.C. § 102(e).

Claim Rejections - 35 U.S.C. § 102(e) - *Kwon*

With regard to the Examiner's rejection of claim 21, the Examiner asserts that *Kwon* teaches frames of re-encoded data from encoded data, citing to col. 3, lines 1-35. Applicants respectfully disagree with the Examiner's characterization of this reference.

It is respectfully submitted that *Kwon* teaches a digital video signal recording/reproducing apparatus for longer playing time. Specifically, *Kwon* teaches:

> The encoded video signal is applied to a decoder 16 of a conventional design which performs the inversion or decoding of the encoding operation performed by any one of the encoding techniques described above. The decoder 16 produces a decoded video signal which may be a PCM signal defining a sequence of video frames, each frame being defined by a set of pixel data. The decoded video signal is then supplied to an encoder block
>
> In the encoder block 20, the decoded video signal from the decoder 16 is subjected to an encoding process. In accordance with the present invention, the encoder block 20 is designed to process the decoded video signal in an intraframe coding mode using a spatial correlation without motion compensation to produce an intra mode compression signal. The encoder block 20 comprises a discrete cosine transform ("DCT) coder 22, a quantizer 24 and a variable length coder("VLC") 26. These are conventional elements commonly used in a DCT compression system, as described in the Chen and Pratt article referred to above. In order to carry out the DCT compression, each video frame is divided into blocks of pixels (usually N.times.N sized square blocks). Each block of pixels is transformed by the DCT transform coder 22 into a set of intra mode transform coefficients. The set of transform coefficients is quantized by the quantizer 24, by controlling the quantization step size, into an intra mode quantization signal and then supplied to the VLC 26. The VLC 26 assigns variable length codewords to the intra mode quantization signal to produce at its output the intra mode compression signal at an irregular bit rate. In this case, since the encoder block 20 can be implemented with the intraframe coding part only in an encoding system, except for the encoding system using the interframe coding, it is possible to simplify the encoder block 20 in its circuit configuration.

In contrast, the present invention set forth in claim 21 recites coded video data generated from a first coded video data by replacing a least plural frames of the first coded video data with a second coded video data wherein the second coded video data is generated by a re-encoded of the plural frames. As *Kwon* fails to teach or suggest these elements, it is respectfully submitted that claim 21 is not anticipated by *Kwon*.

Conclusion

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisinet (Reg. No. 52,327) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By _____
Charles Gorenstein, #29,271

CG/CMV/jdm
1907-0206P

P.O. Box 747
Falls Church, VA 22040-0747
(703) 205-8000

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